

**Federal Defenders
OF NEW YORK, INC.**

Tamara Giwa
Executive Director

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Jennifer L. Brown
Attorney-in-Charge

April 17, 2025

Via ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re. United States v. Samuel Hall
24 Cr. 151 (PGG)**

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Date: April 18, 2025

Dear Judge Gardephe,

I write with the consent of the government and Pretrial Services to respectfully request the return of Mr. Hall's expired United States passport, which is currently in the possession of Pretrial Services, as well as the Court's permission for Mr. Hall to renew this passport.

As part of his bail conditions, Mr. Hall was required to surrender his passport to Pretrial Services and not make any new applications. Mr. Hall's passport has since expired.

Mr. Hall's family is planning a large gathering after Mr. Hall's May 7, 2025 sentencing, for which (if he is permitted to attend) Mr. Hall would need to use his passport. So that he may be in a position to attend this family gathering if the Court grants him permission at sentencing, and given the timeline for the renewal of expired passports, we respectfully ask for this accommodation now. Should Mr. Hall's renewed passport be provided to him before sentencing in this matter, he will surrender it to Pretrial Services consistent with his original bail conditions.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Neil P. Kelly
Assistant Federal Defender
(212) 417-8744

cc: Counsel of record
Pretrial Services Officer Laura Gialanella